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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No. 01-157  
Table of Allotments ) RM - 10178  
FM Broadcast Stations )  
(Woodson, Texas) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

COMMENTS

First Broadcasting Company, L.P., Next Media Licensing, Inc., Rawhide Radio, L.L.C., Capstar TX Limited Partnership and Clear Channel Broadcasting Licenses, Inc. ("Joint Parties"), by their respective counsel, hereby submit their Comments to the *Notice of Proposed Rule Making*, DA 01-1670 (rel. July 13, 2001) in the above-captioned proceeding. The Joint Parties' interest in this proceeding stems from the Counterproposal they filed in MM Docket No. 00-148. The comment date in that proceeding was October 10, 2000. One of the proposals in that Counterproposal was the allotment of Channel 298C2 at Seymour, Texas.

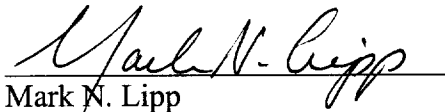
The *NPRM* proposed to allot Channel 298A to Woodson, Texas, as the community's first local aural transmission service. The petition to allot Channel 298A was filed by Charles Crawford on May 18, 2001. The attached channel study demonstrates that the proposal for Channel 298A is short spaced to the prior-filed proposal for Channel 298C2 at Seymour by 99.19 km. The Commission may have failed to identify this short spacing when it issued the *NPRM* in this proceeding because it appears that the Commission had not at that time entered all of the proposals in MM Docket 00-148 into its data base. However, on August 3, 2001, the Commission issued a

Public Notice, Report No. 2500 announcing acceptance of the Seymour rule making proposal. Accordingly, the Commission should rescind the Notice of Proposed Rule Making as late filed to a pending rule making proceeding. See e.g., Comfort, Texas, DA 01-1864 released August 3, 2001.

Accordingly, the Joint Parties urge the Commission to protect their prior filed and cut-off proposal for Channel 298C2 at Seymour, Texas and dismiss the proposal for Channel 298A at Woodson, Texas, expeditiously.

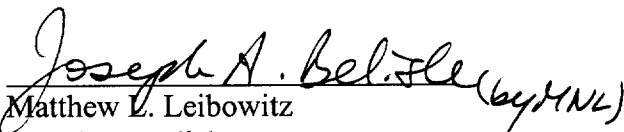
Respectfully submitted

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RAWHIDE RADIO L.L.C.

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CAPSTAR TX LIMITED PARTNERSHIP  
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Their Counsel

August 17, 2001

# CH 298C2 Seymour, TX

Add Ch 298A at Woodson, TX conflicts with original counterproposal

33 34 49 N. Class C2 Search Date  
99 18 01 W. Current rules spacings 08-06-01

----- Channel 298 -107.5 MHz -----

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
RADD	298C2	Seymour	TX	0.0	0.00	190.0	-190.00 *
RADD	298A	Woodson	TX	161.5	66.81	166.0	-99.19 *

Of Note:

New filing that conflicts with original counterproposal

Aloc 297A Knox City TX 242.4 38.90 106.0 -67.10

Of Note:

Knox City manually added to study.

This entry has been out of the database since  
09-01-00

ALLO	298C3	Wellington	TX	327.8	162.61	177.0	-14.39 *
ALLO	299C3	Jacksboro	TX	104.2	104.72	117.0	-12.28 *
KVRW.A	297C2	Lawton	OK	44.8	134.54	130.0	4.54 *
KVRW.A	297C2	Lawton	OK	32.0	138.15	130.0	8.15 *
ALLO	297C2	Lawton	OK	38.0	147.24	130.0	17.24
RDEL	297C2	Lawton	OK	39.7	148.17	130.0	18.17
KVRW	297C2	Lawton	OK	39.7	148.17	130.0	18.17
KOAI	298C1	Fort Worth	TX	116.9	243.31	224.0	19.31
KOAI	298C1	Fort Worth	TX	116.8	244.59	224.0	20.59
KWKQ	296C3	Graham	TX	127.4	82.83	56.0	26.83
RDEL	296C3	Graham	TX	127.4	82.83	56.0	26.83
KOES	295C2	Stamford	TX	220.6	93.84	58.0	35.84
KSJTfM	298C1	San Angelo	TX	206.7	265.85	224.0	41.85
RADD	296C3	Paducah	TX	297.4	105.25	56.0	49.25

**CERTIFICATE OF SERVICE**

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 17th day of August, 2001 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Comments" to the following:

\* Ms. Sharon McDonald  
Federal Communications Commission  
Mass Media Bureau  
445 12th Street, SW  
Room 3-A226  
Washington, DC 20554

Charles Crawford  
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Petitioner for Woodson, Texas

  
Lisa M. Balzer

\* Hand Delivered